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Jefferson - Conner Meeting and Site Orientation  
July 27, 1987  
Detroit, Michigan

rec'd  
8/4/87  
BCE

The City of Detroit has agreed to provide Chrysler with a clean site. The City will assume all responsibility for identification and disposal of any toxic or hazardous materials. Throughout the meeting, Chrysler interjected that Chrysler will assume no responsibility for manifesting or other responsibilities of a waste generator.

Most of the parcels the City must provide Chrysler are residential. The demolition of these dwellings is expected to be routine. Residential demolition is in progress. The City has the responsibility to inspect for asbestos.

Environmental Design Group (EDG) is the primary consultant. RMT and Special Wastes are subconsultants. RMT will prepare parcel reports. These reports will discuss the need for any sampling and, if sampling is needed, it will recommend a sampling plan. Special Wastes would actually remove and dispose any material that would require removal and disposal. Mike Czuprenski, of the Michigan Department of Natural Resources, Northville Field Office, is the State of Michigan's primary contact person for this project.

For hazardous materials, fifty-four parcels have been identified with industrial or commercial histories. Detroit had begun interviews of property owners regarding what materials would be on these properties, but after six interviews, Detroit determined that, because of rules relating to property acquisition, interviews would have to wait until the the property has been acquired. EDG presented a "Hazardous Materials Investigation Flow Chart." A Copy of this is attached.

EDG requested that USEPA provide guidance regarding "further investigation" criteria, action criteria, and remediation criteria. EDG expressed a concern that they will find hundreds of chemicals in the soil, so the mere presence of something should not justify further testing. EDG indicated that they believed some EPA publication existed with a title something like "The most common chemicals found at superfund sites and their cleanup criteria." If such a publication exists, they would like a copy.

A major topic of discussion was what USEPA's role should be in the investigation and possible remedial actions. The city indicated that if we want to have someone on site, the construction manager could provide a desk and a phone. Another suggestion was that someone from USEPA's Grosse Ile Office could provide oversight.

I noted that we would prefer to keep our oversight limited to document review. USEPA should be given an opportunity to review a remedial investigation. Detroit would respond to any comments and provide the results of any additional investigations that we requested. Next, Detroit would develop any necessary remedial actions. USEPA would be given an opportunity to review them. After USEPA reviewed and approved remedial actions, the cleanup work could begin.

EDG noted that such a procedure was impossible. The City plans to do mini-investigations as each parcel is acquired and then expeditiously begin any necessary cleanup.

We discussed the possibility of a monthly report of what has been going on. EDG and Detroit found this acceptable. This would keep us up to date on what was happening. Unfortunately, this would not really give us an opportunity to review and approve anything.

I noted that our previous agreements stipulated that the USEPA would be given an opportunity to review quality control and quality assurance (QAQC) plans and health and safety (HS) plans. The response was that this is complicated because every contractor will have their own plans. I suggested that the City Develop generic QAQC and HS plans. We could review these generic plans and develop an agreement that all QAQC and HS plans will be consistent with the generic plans that we reviewed.

Chrysler was continually interested in the liability issue. They proposed several hypothetical cases. For example:

An existing operation has a RCRA permit. Detroit buys the site for Chrysler. The original owner was supposed to leave a clean property, but instead has run with the acquisition money, leaving wastes.

Who is responsible for disposal? Who is the "generator"? The original owner? Detroit? Is finding the original permit holder necessary? Will USEPA search for the original permit holder? Will the City get a new RCRA permit? Can title to the land be transferred to Chrysler without Chrysler becoming a generator or assuming any other liabilities?

I did not attempt to answer the RCRA permitting questions. Detroit reiterated that they would take any actions necessary to ensure that Chrysler has a clean site and that Chrysler is free from waste liability.

During the afternoon, the site was toured. EDG indicated that they will be photographing many locations. I requested copies of these photographs.

An attendance list of the meeting is attached.

Tom Nowicki: July 27, 1987



environmental  
design  
group

ENGINEERING • LANDSCAPE ARCHITECTURE • SURVEYING

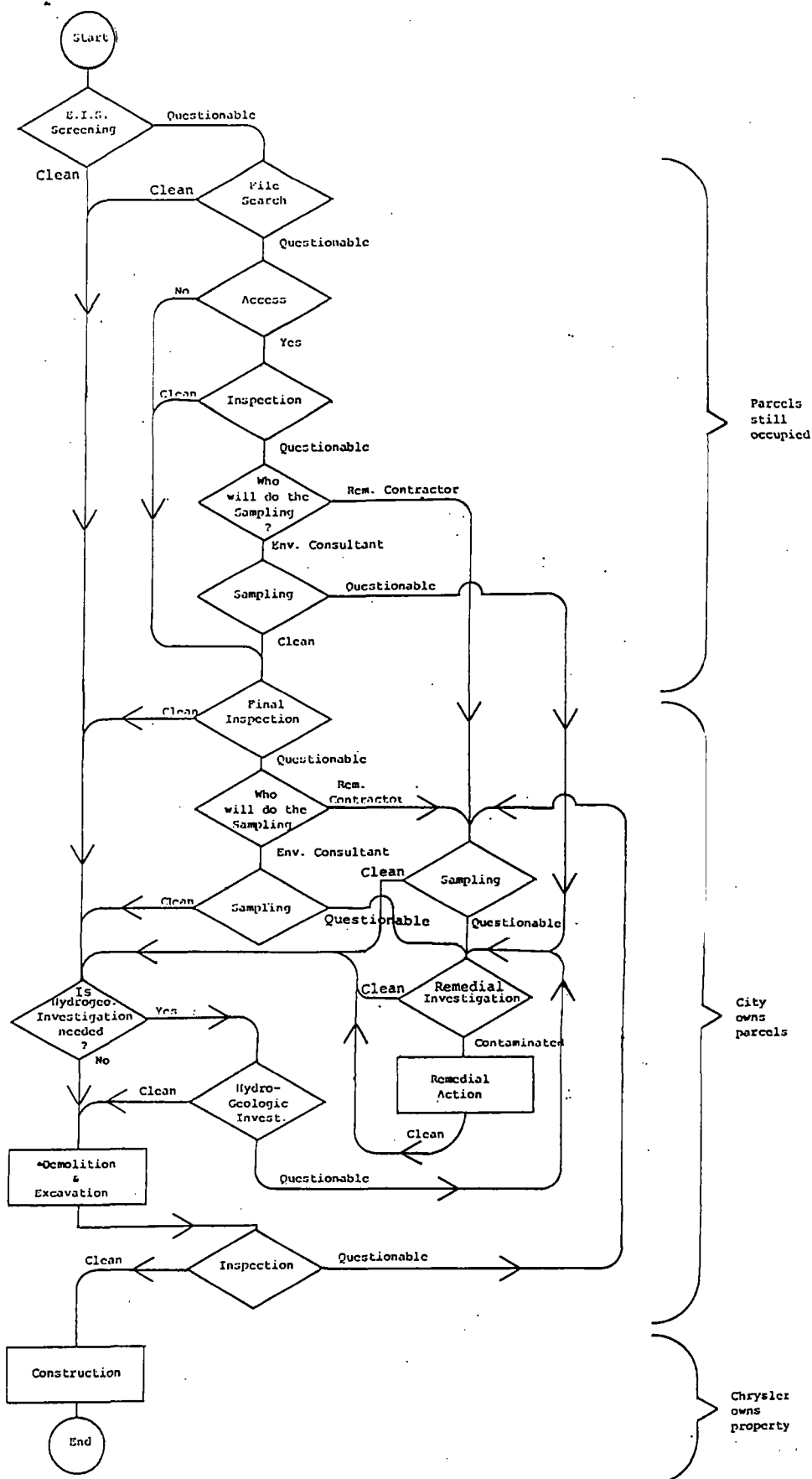
SUBJECT JEFF/CONN  
REHEARSAL MTC  
FOR  
USEPA MTC

JOB NUMBER 7/27/87  
SHEET NO.      OF       
COMP. BY      DATE       
CHK'D. BY      DATE     

<u>NAME</u>	<u>REPRESENTING</u>
R.C. LARHAM	BDG
D.J. KENNEDY	CHRYSLER, LAMAR, P&H.
GA GRZADZINSKI	CHRYSLER ODMTC
ED SAHAS	CHRYSLER JEFFERSON
Geoff, Geppert	CHRYSLER JEFFERSON
Don Wiercorak	CHRYSLER ODMTC 369-6251
Dan Heath	B-M
BOB KENNEDY	BARTON MAOW CO. 548-2000
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JOE CRIGER	City of Detroit 274-2374

**HAZARDOUS MATERIALS  
INVESTIGATION  
JEFFERSON/CONNORS**

## INVESTIGATION PROCESS FLOW CHART



JEFFERSON - CONNER  
CITY/EPA MEETING  
7/27/87

A. SITE/PROJECT DESCRIPTION

- (1) Cast of Characters
- (2) Site and Project Overview

B. OUTLINE OF METHODOLOGY

- (1) Larlham and RMT review, update and current status
- (2) EPA Comment on Methodology

C. DNR ROLE

(Occasions where they participate)

- (1) - Key contact for quick action
- (2) - Role in acceptance of generator status/manifests
- (3) - Time from City acquisition to removal of materials

No compliance activities other than for removal or temporary storage and site safety actions

- (4) - Remediation Plans
  - Preparation of plan - responsibilities for .....
  - EPA involvement during preparation
  - Review and approval process